

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

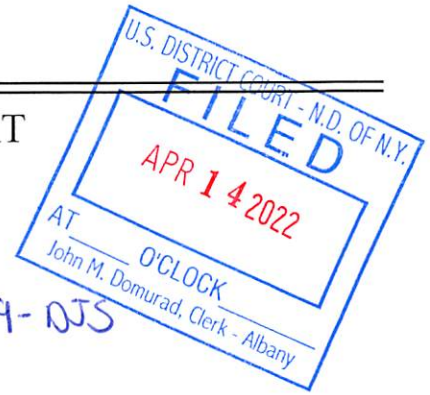
v.)

AARON GRIESCHE)

Case No. 1:22-MJ-179-DJS)

Defendant)

CRIMINAL COMPLAINT



I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of July 11, 2021 in the county of Schenectady in the Northern District of New York the defendant violated:

Code Section
18U.S.C. §2252A(a)(2)

Offense Description
Receipt of Child Pornography

This criminal complaint is based on these facts:
See attached sheet.

☒ Continued on the attached sheet.

A handwritten signature in black ink, appearing to be "B Seymour".

Complainant's signature

Brian Seymour, FBI Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 4/14/2022

A handwritten signature in black ink, appearing to be "D Stewart".

Judge's signature

City and State: Albany, NY

Hon. Daniel J. Stewart, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Brian Seymour, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. This affidavit is made in support of a criminal complaint charging Aaron GRIESCHE with violating 18 U.S.C. § 2252A(a)(2) (receipt of child pornography).

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since September 2007. I have conducted and participated in numerous investigations of criminal activity, including but not limited to criminal violations relating to child exploitation, including the sexual exploitation of minors and the possession and receipt of child pornography, in violation of 18 U.S.C. §§ 2251 and 2252A. During the investigation of these cases, I have participated in the execution of search warrants and seized evidence of these violations. In addition, I have received formal training in the area of child pornography and child exploitation. During the investigation of these cases, I have executed, or participated in the execution of, numerous search warrants, and seized evidence of these violations, including electronic evidence.

3. The facts in this affidavit come from my personal observations and investigation, information and reports received as well as discussion with other law enforcement officers and agents and my training and experience.

4. Because this affidavit is being submitted for the limited purpose of supporting a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that GRIESCHE has violated 18 U.S.C. § 2252A(a)(2) (receipt of child pornography).

PROBABLE CAUSE

5. In July 2021, the National Center for Missing Children (NCMEC) received a report from a member of the public concerning a flash storage drive containing files believed to be child pornography. The reporting individual stated that on July 22, 2021, the reporting individual entered GRIESCHE's room and found a USB flash storage drive with at least 76 gigabytes of files the reporting individual characterized as possible child pornography files.

6. On July 25, 2021, an investigator with the New York State Police telephonically contacted the reporting individual but was referred to a guardian of the reporting individual who confirmed the details contained from the NCMEC report concerning the discovery of the USB flash storage device. The flash drive was later turned over to the custody of the NYSP.

7. On August 2, 2021, the guardian of the reporting individual went to the NYSP Latham barracks and provided additional information, stating that she confronted GRIESCHE about the black and silver USB storage drive found in his bedroom. GRIESCHE initially denied knowing where the drive came from, but later admitted to finding the drive in a field while he was operating a school bus on a school class trip.

8. NYSP conducted a forensic examination of the flash drive, which revealed at least five hundred (500) video files containing sexually explicit depictions of minors, which a NYSP investigator determined constituted child pornography and provided your affiant with the following three descriptions of the files observed on the flash drive:

- a. **"Izzy 8yo 1b - Deep-throating.mpg.avi"** - a video file approximately seven minutes long, which depicts a prepubescent female, approximately eight years old performing oral sex on an erect adult male's penis.
- b. **"Jenny 9yo daughter sucking cock while watching porn.avi.mov"** - a video file

approximately three minutes long, which depicts an adult male hand rubbing the labia of a prepubescent female, approximately nine years old. The female is lying on a bed naked with a black choker collar on her neck. The female then performs oral sex on the adult male's erect penis.

- c. **"bb1part1e.mp4"** – a video file approximately one and a half minutes long, which depicts a naked prepubescent female laying on her back with her feet in the air, and a semi-erect adult male penis is performing anal sex with the female.
- d. **"NewBaby2017.mp4"** – a video file approximately fifteen seconds long which depicts an infant female baby in pink clothing performing oral sex on an erect adult male penis

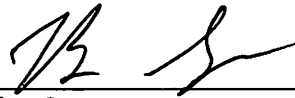
9. The NYSP forensic investigator also noted that there did not appear to be any deleted material on the flash drive and the "Created" date of all of the files (the date they were potentially "created" on the device) appeared to be July 11, 2021, with access times also consistent with the July 11, 2021 date. Further forensic analysis by the FBI of computers seized from the residence where GRIESCHE resided in August 2021 revealed that one of the laptop computer's that was seized was used to transfer images of child pornography from a hard drive connected to the laptop to a USB thumb drive that was also connected to the laptop between on or about July 11, 2021, to on or about July 12, 2021. Additional investigation by FBI revealed that GRIESCHE had used his Amazon account to purchase a thumb drive matching the description of the thumb drive located in his bedroom, as well a SATA cord that is used to connect a hard drive to a computer, approximately a week earlier, on or about July 3, 2021.

10. On April 14, 2021, in an additional post-*Miranda* interview, GRIESCHE admitted that he had accessed the dark web to download images of child pornography that he then saved to

a laptop that no longer functions, that he had ordered the thumb drive and SATA cord specifically to transfer the child pornography from the hard drive of the laptop that no longer functioned to the thumb drive, and that he used one of the laptops recovered at his residence to do so. Based on my training and experience, I know that accessing the dark web requires an internet connection and internet capable device, such as a laptop.

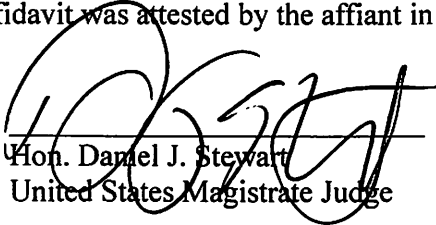
CONCLUSION

11. I respectfully submit that this affidavit supports probable cause for a criminal complaint charging GRIESCHE with violating 18 U.S.C. § 2252A(a)(2) (receipt of child pornography).



Brian Seymour
FBI Special Agent

I, the Honorable Christian F. Hummel, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant in my presence this 14 day of April 2022:



Hon. Daniel J. Stewart
United States Magistrate Judge